

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

CAREER COLLEGES & SCHOOLS
OF TEXAS,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
EDUCATION; MIGUEL CARDONA,
in his official capacity as the Secretary
of Education,

Defendants.

Case No. 1:23-cv-00433-RP

PLAINTIFF’S UNOPPOSED MOTION FOR EXCESS PAGES

Pursuant to Local Court Rule CV-7(e)(3), Plaintiff respectfully requests leave to file a reply brief of up to 25 pages in support of its motion for preliminary injunction. Defendants consent to this request. Good cause exists for the following reasons:

1. On April 5, 2023, Plaintiff filed a 25-page brief in support of its motion for preliminary injunction in the U.S. District Court for the Northern District of Texas. ECF No. 24. Opening briefs in the Northern District are limited to 25 pages. N.D. Tex. Civ. R. 7.2(c).
2. On May 11, 2023, after this case was transferred to this Court, Defendants filed an unopposed motion for leave to file a 40-page brief in opposition to Plaintiff’s motion for preliminary injunction. ECF No. 54.
3. On May 15, 2023, Defendants filed a 40-page brief in opposition to Plaintiff’s motion for preliminary injunction. ECF No. 56. That brief raises a number of new issues, and

Plaintiff respectfully submits that the Court would benefit from a commensurately detailed reply brief.

4. On May 16, 2023, the Court entered a text order granting Defendants' motion for leave to file excess pages.

5. In light of Defendants' 40-page opposition to Plaintiff's 25-page opening brief—as well as the number, complexity, and importance of the issues presented—Plaintiff respectfully submits that a 25-page limit is appropriate for a fair and adequate reply.

6. Plaintiff's counsel have conferred with Defendants' counsel, who do not oppose the requested relief.

For these reasons, Plaintiff respectfully requests that the Court enter the attached Proposed Order granting leave for Plaintiff to file a reply brief of up to 25 pages in support of its motion for preliminary injunction.

Dated: May 16, 2023

Respectfully submitted,

/s/ Tor Tarantola

Allyson B. Baker (*pro hac vice*)
Meredith L. Boylan (*pro hac vice*)
Stephen B. Kinnaird (*pro hac vice*)
Michael Murray (*pro hac vice*)
Sameer P. Sheikh (*pro hac vice*)
Tor Tarantola (*pro hac vice*)
PAUL HASTINGS LLP
2050 M Street NW
Washington, DC 20037
Telephone: (202) 551-1830
Fax: (202) 551-0330
Email: allysonbaker@paulhastings.com

Philip Vickers (TX Bar No. 24051699)
Katherine Hancock (TX Bar No. 24106048)
CANTEY HANGER LLP
600 West 6th Street, Suite 300
Fort Worth, TX 76102
Telephone: (817) 877-2800
Fax: (817) 877-2807
Email: pvickers@canteyhanger.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record via the Court's CM/ECF system on May 16, 2023.

/s/ Tor Tarantola

Tor Tarantola